

HOFLAND & TOMSHECK
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA

Plaintiff,

vs.

KEYNAN ROSE,

Defendant.

Case No.: 2:18-cr-00206-JAD-DJA

Stipulation and Order to Continue
Sentencing
(First Request)

IT IS HEREBY STIPULATED AND AGREED by and between Christopher Chiou, Acting United States Attorney, and Christopher Burton, Assistant United States Attorney, counsel for the United States of America, and Joshua Tomsheck, Esq., counsel for Defendant, KEYNAN ROSE, that the Sentencing currently scheduled for May 9, 2022 at 11:00 A.M. to a date and time to be set by this Honorable Court, but no sooner than thirty (30) days.

This Stipulation is entered into for the following reasons:

1. This is the first Sentencing continuance request.
2. The additional time requested herein is not sought for purposes of delay, but due to defense counsel being in a homicide trial for approximately three weeks and has not been able to address important issues concerning Mr. Rose before his sentencing.
3. Defendant is in custody and does not object to the continuance.
4. The parties agree to the continuance.
5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

6. For the above stated reasons, the parties agree that a continuance of the Sentencing date would best serve the ends of justice in this case.

DATED this 5th day of May, 2022.

Respectfully submitted,

HOFLAND & TOMSHECK

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Joshua Tomsheck
JOSHUA TOMSHECK, ESQ.
Counsel for Defendant
KEYNAN ROSE

/s/ Christopher Burton
CHRISTOPHER BURTON, ESQ.
Assistant United States Attorney

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FINDINGS OF FACT

Based upon the pending Stipulation of counsel, and good cause appearing therefor,
the Court hereby finds that:

This Stipulation is entered into for the following reasons:

1. This is the first Sentencing continuance request.
2. The additional time requested herein is not sought for purposes of delay, but due to defense counsel being in a homicide trial for approximately three weeks and has not been able to address important issues concerning Mr. Rose before his sentencing.
3. Defendant is in custody and does not object to the continuance.
4. The parties agree to the continuance.
5. Additionally, denial of this request for continuance could result in a miscarriage of justice.
6. For the above-stated reasons, the parties agree that a continuance of the Sentencing Date would best serve the ends of justice in this case.

// /

ORDER

IT IS HEREBY ORDERED that the Sentencing date in the above-captioned matter currently scheduled for May 9, 2022 at 11:00 A.M. be vacated and continued to June 13, 2022, at 3:00 p.m.

DATED this 5th day of May, 2022.


UNITED STATES DISTRICT JUDGE

HOFLAND & TOMSHECK
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